

**IN THE UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF MONTANA, BILLINGS DIVISION**

Reciprocity Industries, LLC,

Plaintiff,

-vs-

Century Indemnity Company,

Defendant.

Case No. 21-00011

**DECLARATION OF SALVATORE J. COCCHIARO IN SUPPORT
OF CENTURY'S RESPONSE TO MOTION TO QUASH
AND MOTION TO TRANSFER RECIPROCITY
INDUSTRIES, LLC'S MOTION TO QUASH SUBPOENA TO THE
BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE**

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*Counsel for Century Indemnity
Company, as successor to CCI
Insurance Company, as successor to
Insurance Company of North America*

I, **SALVATORE J. COCCHIARO**, declare as follows:

1. I am an associate at the firm O'Melveny & Myers LLP. I submit this declaration based on my knowledge of the proceedings in this matter, information regarding the Boy Scouts of America bankruptcy, and my review of the pleadings, in support of (i) *Century's Response to Reciprocity Industries, LLC's Motion to Quash Century's Subpoena*, (ii) *Century's Motion to Transfer Reciprocity Industries, LLC's Motion to Quash Subpoena to the Bankruptcy Court for the District of Delaware*, and (iii) *Century's Emergency Motion to Shorten Notice of the Motion to Transfer*.

2. Attached hereto as **Exhibit 1** is a true and correct copy of Timothy D. Kosnoff's Sur-Reply in Support of His Objection to Insurers' Motion for an Order Authorizing Rule 2004 Discovery of Certain Proofs of Claim, dated February 16, 2021.

3. Attached hereto as **Exhibit 2** is a true and correct copy of the August 30, 2021 Hearing Transcript.

4. Attached hereto as **Exhibit 3** is a true and correct copy of the Debtor's Emergency Motion for Entry of an Order (I) Enforcing the Solicitation Procedures Order, (II) Enforcing Section 1103 of the Bankruptcy Code Against the Tort Claimants' Committee, and (III) Granting Related Relief, dated November 10, 2021.

5. Attached hereto as **Exhibit 4** is a true and correct copy of the August 25, 2020 Declaration of Evan Roberts.

6. Attached hereto as **Exhibit 5** is a true and correct copy of the August 26, 2020 Declaration of Janine Panchok-Berry.

7. Attached hereto as **Exhibit 6** is a true and correct copy of the August 26, 2020 Exhibits to the August 26, 2020 Declaration of Janine Panchok-Berry.

8. Attached hereto as **Exhibit 7** is a true and correct copy of the Exhibits to the Second Amended Verified Statement of Coalition of Abused Scouts for Justice, dated October 7, 2020.

9. Attached hereto as **Exhibit 8** is a true and correct copy of the February 11, 2021 Declaration of Erich Speckin.

10. Attached hereto as **Exhibit 9** is a true and correct copy of the Verified Statement of Abused in Scouting, dated August 9, 2021.

11. Attached hereto as **Exhibit 10** is a true and correct copy and correct copy of Cross and Simon, LLC's Letter to Judge Silverstein, dated September 6, 2021.

12. Attached hereto as **Exhibit 11** is a true and correct copy of the September 9, 2021 Discovery Order.

13. Attached hereto as **Exhibit 12** is a true and correct copy of the October 8, 2021 Scheduling Order.

14. Attached hereto as **Exhibit 13** is a true and correct copy of the Deposition Subpoena of Andrew Van Arsdale, with certificate of service, dated October 4, 2021.

15. Attached hereto as **Exhibit 14** is a true and correct copy of the Document Subpoena of Andrew Van Arsdale, with certificate of service, dated October 4, 2021.

16. Attached hereto as **Exhibit 15** is a true and correct copy of the Responses and Objections of Andrew Van Arsdale to Century's Subpoenas, dated October 18, 2021.

17. Attached hereto as **Exhibit 16** is a true and correct copy of Gomez Trial Attorney's Letter to Stamatios Stamoulis, dated October 15, 2021.

18. Attached hereto as **Exhibit 17** is a true and correct copy of the November 12, 2021 Hearing Transcript.

19. Attached hereto as **Exhibit 18** is a true and correct copy of the Motion of Marc J. Bern & Partners to Quash Subpoena to Produce Documents issued to KLS Legal Solutions, LLC, dated September 27, 2021.

20. Attached hereto as **Exhibit 19** is a true and correct copy of Century's Objection to Marc J. Bern & Partners' Motion to Quash Subpoena to Produce Documents issued to KLS Legal Solutions, LLC, dated October 12, 2021.

21. Attached hereto as **Exhibit 20** is a true and correct copy of Century's Letter Motion to Compel Verus, LLC to Comply with Subpoena, dated October 27, 2021.

22. Attached hereto as **Exhibit 21** is a true and correct copy of the Modified Fifth Amended Chapter 11 Plan of Reorganization for Boy Scouts of America and Delaware BSA, LLC, dated September 30, 2021.

23. Attached hereto as **Exhibit 22** is a true and correct copy of the Amended Disclosure Statement for the Fifth Amended Chapter 11 Plan of Reorganization for Boy Scouts of America and Delaware BSA, LLC, dated September 30, 2021.

24. Attached hereto as **Exhibit 23** is a true and correct copy of the Omnibus Reply of the Coalition of Abused Scouts for Justice, dated October 13, 2020.

25. Attached hereto as **Exhibit 24** is a true and correct copy of the October 14, 2020 Hearing Transcript.

26. Attached hereto as **Exhibit 25** is a true and correct copy of the Document Subpoena to Reciprocity Industries, LLC, dated September 10, 2021.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 15th day of November 2021 in New York, New York.

/s/ Salvatore J. Cocchiaro
Salvatore J. Cocchiaro